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CLERK, U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIAIN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Name and address of Plaintiff

Thuy Vo KS8911
175 Progress Drive
Waynesburg, PA 15370

18-1364

v.

Full name, title, and business address
of each defendant in this action:1 Robert Gilmore (Supt.)
169 Progress Drive
Waynesburg, PA. 153703. Stephen Durco (Security Capt
169 Progress Drive
Waynesburg, PA. 153702 Michael Zaken (DSFM)
169 Progress Drive
Waynesburg, PA. 15370Use additional sheets, if necessary
Number each defendant.Plaintiff brings this action against the above named and identified defendants on the following cause of
action:I. Where are you now confined? SCI-GREENEWhat sentence are you serving? Life without paroleWhat court imposed the sentence? Court of Common Pleas of Bucks County

II. Previous Lawsuits

A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved
in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece
of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs

Thuy Vo (N/A)

Defendants

Robert Gilmore, Michael Zaken and
Stephen Durco

2. Court (if federal court, name the district; if state court, name the county) and docket number

3. Name of judge to whom case was assigned N/A
4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)

5. Approximate date of filing lawsuit _____

6. Approximate date of disposition _____

- B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where? SCI-GREENE/PA. State Police

When? _____

Result: No response

- III. What federal law do you claim was violated? US. Constitution
Fourth Amendment/ 18 USCS §1801/ 28 CFR 115.5

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

A. Date of event: 3-29-18 and 3-31-18

B. Place of event: SCI-Greene; Visiting Strip

- C. Persons involved—name each person and tell what that person did to you: All three defendants have initiated the practice of video recording inmates being strip-searched going to and coming from visits, and during urine tests, and while using the bathroom.

I went up to a visit, I was being video recorded while I was being strip searched. The position of the camera was directly above the toilet.

V. Did the incident of which you complain occur in an institution or place of custody in this District?

If so, where?

Yes. SCI-Greene ; Visiting Strip

and answer the following questions:

A. Is there a prisoner grievance procedure in this institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☐ No ☒

C. If your answer is YES,

1. What steps did you take? Filed an PREA complaint to:

PA. State Police

2. What was the result? No response

D. If your answer is NO, explain why not: The PREA policy
supersedes the institutions grievance policy.

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

Yes ☒ No ☐

F. If your answer is YES,

1. What steps did you take? N/A

2. What was the result? N/A

VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statues.

Order the defendants to immediately cease and desist
the policy/practice of recording inmates during strip-searches,
immediately remove the cameras from the visiting strip room,
grant an injunction barring retaliation, and grant Plaintiff(s)
monetary damages in the amount of \$25,000.00 + punitive damages +

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND court fees
CORRECT.

10-5-18
(Date)

Ty Vo
(Signature of Plaintiff)